

1 JASON J. BACH
2 Nevada Bar No. 7984
3 **THE BACH LAW FIRM, LLC**
4 7881 West Charleston, Suite 165
5 Las Vegas, Nevada 89117
6 Telephone: (702) 925-8787
7 Facsimile: (702) 925-8788
8 Email: jbach@bachlawfirm.com
9 *Attorney for Plaintiffs*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 MICHELLE COX, individually, and as parent
13 and next friend of M.C.,

14 *Plaintiffs,*

15 v.

16 RYAN LEWIS, individually, and in his official
17 capacity; JORGE PALACIOS, individually,
18 and in his official capacity; and CLARK
19 COUNTY SCHOOL DISTRICT,

20 *Defendants.*

21 Case No.: 2:20-cv-01792-JCM-BNW

22 **STIPULATION AND ORDER
TO EXTEND RESPONSE TO
DISPOSITIVE MOTION DEADLINE
(FIRST REQUEST)**

23 Plaintiffs Michelle Cox, individually, and as a parent and next friend of M.C.,
24 (“Plaintiffs”), by and through their counsel of record, Jason J. Bach, of The Bach Law Firm, LLC,
25 and Defendants Clark County School District (“CCSD”), Ryan Lewis (“Lewis”), and Jorge
Palacios (“Palacios”) (collectively, the “CCSD Defendants” and, together with Plaintiffs, the
“Parties”), by and through their counsel of record, Craig R. Anderson and Jackie V. Nichols, of
Marquis Aurbach, hereby agree and jointly stipulate the following:

26 1. This request for an extension of time is not sought for an improper purpose or other
27 purpose of delay. This is the first request for extension of time to respond in this matter.

28 2. On August 31, 2022, the Parties filed a Stipulation and Order to Extend the
29 Dispositive Motion Deadline [Docket No. 55], up to and including September 6, 2022, and to

1 extend the time for Plaintiffs to file their response to CCSD Defendants' Dispositive Motion up to
2 and including October 6, 2022.

3 3. On September 1, 2022, the Court entered an Order Granting and Denying in Part
4 the Parties' Stipulation and Order [Docket No. 56]. By such Order, the Court granted the Parties'
5 request to extend the Dispositive Motion deadline but denied the Parties' request to extend
6 Plaintiffs' response-brief deadline and stated that the Parties must file a separate stipulation
7 seeking this relief pursuant to LR IC 2-2(b).

8 4. On September 6, 2022, the CCSD Defendants filed a Motion to Exceed Page Limit
9 on their Motion for Summary Judgment [Docket No. 57] and a Motion for Leave to File Under
10 Seal [Docket No. 58], which remain pending before the Court at the time of filing this Stipulation.
11 Also, on September 6, 2022, the CCSD Defendants filed a Motion for Summary Judgment [Docket
12 No. 59].

13 5. Pursuant to the CCSD Defendants' Motion to Exceed Page Limit on their Motion
14 for Summary Judgment, the CCSD Defendants anticipated filing a 60-page Motion for Summary
15 Judgment and, in fact, the Motion for Summary Judgment filed by the CCSD Defendants
16 numbered 63 pages. Plaintiffs are requesting additional time to respond to the CCSD Defendants'
17 oversized Motion.

18 6. Additionally, counsel for Plaintiff was out of the country from September 9, 2022,
19 through September 13, 2022, and in addition to his normal caseload, counsel for Plaintiff will need
20 to prepare and act as Mediator in the *ACF Finco I, LP v. Taylor Metal, Inc. d/b/a Taylor Metal*
21 *Products*, United States Bankruptcy Court for the District of Nevada (Las Vegas), Case No. 2:21-
22 ap-01254-mkn.

23 7. The Parties respectfully submit that the reasons set forth above constitute
24 compelling reasons for the modest extension of time.

25 8. WHEREFORE, Plaintiffs' counsel will have 30 days to file a response to the CCSD
26 Defendants' Motion for Summary Judgment, which response will be due no later than October 6,
27 2022.

28 ///

1 9. This Stipulation is being entered in good faith and not for purposes of delay.

2 **IT IS SO STIPULATED AND AGREED.**

3 Dated this 14th day of September, 2022.

4 **THE BACH LAW FIRM, LLC**

5 By: /s/ Jason J. Bach

6 Jason J. Bach
7 Nevada Bar No. 7984
8 7881 W. Charleston Blvd., Suite 165
9 Las Vegas, NV 89117
10 *Attorneys for Plaintiff*

11 Dated this 14th day of September, 2022.

12 **MARQUIS AURBACH COFFING**

13 By: /s/ Jackie V. Nichols

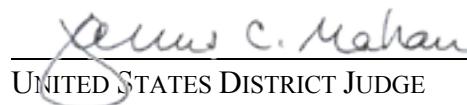
14 Craig R. Anderson
15 Nevada Bar No. 6882
16 Jackie V. Nichols
17 Nevada Bar No. 14246
18 10001 Park Run Drive
19 Las Vegas, Nevada 89145

20 Clark County School District
21 Office of the General Counsel
22 Crystal J. Herrera
23 Nevada Bar No. 12396
24 5100 West Sahara Avenue
25 Las Vegas, Nevada 89146
26 *Attorneys for Defendant*

27 **ORDER**

28 The above Stipulation is hereby GRANTED.

29 IT IS SO ORDERED this 16 day of September, 2022, that Plaintiffs' counsel will have
30 days to file a response to the CCSD Defendants' Motion for Summary Judgment, which
31 response will be due no later than October 6, 2022.

32 
33 _____
34 UNITED STATES DISTRICT JUDGE